CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT

Chief Industries, Inc.
1225 East Maple Street
Rensselaer, Indiana 47978

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-073-10313-00234	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

A.1 General Information

The Permittee owns and operates a steel beam and associated steel building components manufacturing plant.

Responsible Official:	Debra McDowell
Source Address:	1225 East Maple Street, Rensselaer, Indiana 47978
Mailing Address:	1225 East Maple Street, Rensselaer, Indiana 47978
SIC Code:	3448
County Location:	Jasper
County Status:	Attainment for all criteria pollutants
Source Status:	Minor Part 70 Permit Program Minor Source, under PSD Rules

A.2 Emission Units and Pollution Control Equipment Summary

One (1) Electrodeposition System (E-Coat Dip Tank) , which is capable of coating 26,250 pounds of flat metal per hour.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source will not be required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

a. It is a minor source, as defined in 326 IAC 2-7-1(22).

SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.4]

B.1 General Construction Conditions

(a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).

(b) This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1-9(b)]

Pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Permit Review Rules [326 IAC 2]

Notwithstanding Construction Condition No. B.5, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 First Time Operation Permit [326 IAC 2-1-4]

This document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1(Fees).

(e) Pursuant to 326 IAC 2-1-4, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. The operation permit issued shall contain as a minimum the conditions in the Operation Conditions section of this permit.

Operation Conditions

B.6 General Operation Conditions

(a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Maintenance Plans), the Permittee shall prepare and maintain a Preventive Maintenance Requirements), the change must be approved by the Office of Air Management (OAM).

(b) The Permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC13-17) and the rules promulgated thereunder.

B.7. Preventive Maintenance Plan [326 IAC 1-6-3]

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plan, including the following information:

(a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.

(b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.

(c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

B.8 Transfer of Permit [326 IAC 2-1-6]

Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

(a) In the event that ownership of this steel beam and associated steel building components manufacturing plant is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.

(b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.

(c) The OAM shall reserve the right to issue a new permit.

B.9 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

B.10 Availability of Permit [326 IAC 2-1-3(l)]

Pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitation and Standards

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The source is an existing minor source under 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21.

C.2 Opacity Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the opacity from the source shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.4 Operation of Equipment

All air pollution control equipment listed in this permit shall be in placed or operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

Testing Requirements [326 IAC 2-8-4(3)]

C.5 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by the IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements

C.6 Compliance Monitoring

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

C.7 Maintenance of Monitoring Equipment

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.8 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the requirements of this permit shall be performed, according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.9 Monitoring Data Availability

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing. All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.11 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.12 General Record Keeping Requirements

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.13 General Reporting Requirements

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.1 FACILITY CONDITIONS

One (1) Electrodeposition System (E-Coat Dip Tank) , which is capable of coating 26,250 pounds of flat metal per hour.

Emissions Limitation and Standards

D.1.1 Volatile Organic Compounds 326 IAC 8-2-9 (Miscellaneous Metal Coating)

(1) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of the coatings applied to steel beams and associated steel building components shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calender day, for extreme performance coatings.

(2) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Compliance Determination Requirements

D.1.2 Volatile Organic Compounds

The daily volume weighted average of the VOC content of the coatings used in the E-Coat Dip Tank as limited in Condition D.1.1 shall be determined using the following equation:

$$\text{volume weighted ave.} = 3 \text{ coats [density, lb/gal} * \text{wt. \% organics} * \text{gal of mat'l., gal/unit} / \left[1 - \frac{\text{\% vol water} * \text{density coat, lb/gal}}{\text{density water, lb/gal}}\right] \Big/ [3 \text{ coats, gal/unit}]$$

D.1.3 Volatile Organic Compounds

Compliance with the VOC content limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) using formulation data supplied by the coating manufacturer. However, IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements

D.1.4 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the limits established in Conditions D.1.1.

(1) The amount of VOC content of each coating material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each calendar day;

(4) The cleanup solvent usage for each day;

(5) The total VOC and HAP usage for each calendar day;

(6) The weight of VOC and HAP emitted for each compliance period;

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

NEW CONSTRUCTION AND OPERATION

SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name: Chief Industries, Inc.
Source Address: 1225 East Maple Street, Rensselaer, Indiana 47978
Mailing Address: 1225 East Maple Street, Rensselaer, Indiana 47978
CP No.: CP073-10313-00234

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (Permit Condition D.1.1)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name:	Chief Industries, Inc.
Source Location:	1225 East Maple Street, Rensselaer, IN 47978
County:	Jasper
Construction Permit No.:	CP-073-10313-00234
SIC Code:	3448
Permit Reviewer:	Aida De Guzman

The Office of Air Management (OAM) has reviewed an application from Chief Industries, Inc. relating to the proposed construction and operation of the following equipment used in the manufacture of metal beams and associated steel building components:

One (1) Electrodeposition System (E-Coat Dip Tank) , which is capable of coating 60,000 pounds of flat metal per hour.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
2	E-coat dip tank	4	3.5	34,963	ambient

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 30, 1998, with additional information received on December 1, 1998.

Emissions Calculations

(a) Electrodeposition System (E-coat Dip Tank) VOC Emission Calculations: See Page 1 of 1 TSD Appendix A for detailed calculations.

(b) Electrodeposition System (E-Coat Dip Tank) HAP Emission Calculations**:**

Vectrocoat 300:

Formaldehyde Emissions = 10.6 lb/gal * 0.1% HAP by wt. * 0.275 gal/unit * 10 units/hr * 8760 hr/yr * ton/2000 lb
= 0.13 ton/yr

Total Potential and Allowable Emissions

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	0.0	0.0
Particulate Matter (PM10)	0.0	0.0
Sulfur Dioxide (SO_2)	0.0	0.0
Volatile Organic Compounds (VOC)	28.46	28.46
Carbon Monoxide (CO)	0.0	0.0
Nitrogen Oxides (NO_x)	0.0	0.0
Single Hazardous Air Pollutant (HAP)	0.13	0.13
Combination of HAPs	0.13	0.13

(a) The potential emissions before control are equivalent to the allowable emissions, therefore, either the potential or allowable emissions before control are used for the permitting determination.

(b) Allowable emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Jasper County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Jasper County has been classified as attainment or unclassifiable for (pollutant(s)). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions based on the only approval issued to the source):

Approval Type	Pollutant	Emissions (ton/yr)
Registration - issued on March 1, 1988	PM	0.0
	PM10	0.0
	SO_2	0.0
	VOC	24.0
	CO	0.0
	NO_x	0.0

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Proposed Modification

PTE from the proposed modification (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Proposed Modification	0.0	0.0	0.0	28.46	0.0	0.0
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit **CP-073-10313-00034**, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source.

Federal Rule Applicability

(a) New Source Performance Standards

(1) 40 CFR § 60.460, Subpart TT - Standards of Performance for Metal Coil Surface Coating. This NSPS applies to the following facilities in a coil coating operation: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously. This subpart applies to these facilities of which construction, modification or reconstruction commenced after January 5, 1981.

The source uses **flat metal** and **coil metal** as components in the fabrication of beam and associated steel building structures. The flat metal is the only component that is painted by the source. The coil metal comes at the source pre-painted and no additional coating is made to it. Therefore, this NSPS does not apply to the source.

(2) There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this facility.

(b) National Emissions Standard for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63
There are no NESHAPs that may possibly be applicable to this source.

State Rule Applicability

(a) 326 IAC 2-6 (Emission Reporting)
This facility is not subject to 326 IAC 2-6 (Emission Reporting), because the source does not emit more than 100 tons/yr of any pollutant, nor it is one of the listed counties in the rule that emits 10 tons per year or more of VOC or NOx.

(b) 326 IAC 8-2-9 (Miscellaneous Metal Coating)
This rule applies to metal coating facilities which commences construction after July 1, 1990, which have actual emissions of greater than 15 pounds of VOC per day before add-on control.

This rule applies to the proposed Electrodeposition Coat System (E-Coat Dip Tank), used in the **flat steel** coating. This rule mandates a limit in the volatile organic compound (VOC) content of the **extreme performance coatings** applied to the flat steel to 3.5 pounds of VOC per gallon of coating less water.

The source is in compliance with the rule since the calculated volume-weighted average VOC content of the coatings applied to the flat steel is less than 3.5 pounds per gallon less water (see below equation).

$$\text{Vol-Weighted Ave} = \frac{3 \text{ coats [density, lb/gal} * \text{wt. \% organics} * \text{gal of mat'l., gal/unit} / [1 - \% \text{ vol water} * \frac{\text{density coat, lb/gal}}{\text{density water, lb/gal}}]}{[3 \text{ coats, gal/unit}]}$$

$$= \frac{[10.6 \text{ lb/gal} * 22.2\% * .275 \text{ gal/unit}] / [(1-0.6\% * 10.6 \text{ lb/gal} / 8.33 \text{ lb/gal})] + [8.5 \text{ lb/gal} * 100\% * .001 \text{ gal/unit}] / [(1-15.3\% * 8.5 \text{ lb/gal} / 8.33 \text{ lb/gal})]}{0.276 \text{ gal/unit}}$$

= 1.9 lb/gal less water < 3.5 lb/gal less water

(c) 326 IAC 6-3 (Process PM Emission Limit)
This rule does not apply to the Electrodeposition Coat System (E-Coat Dip Tank) because there are no PM overspray emissions coming from this facility.

(d) 326 IAC 8 (Volatile Organic Sources)
There are no other provisions in Article 326 IAC 8 that applies to the facility, because it does not meet any of the described operations in the rule.

(e) 326 IAC 2-1-3.4 (New Source Toxics Control Rule)
This rule does not apply to the Electrodeposition Coat System (E-Coat Dip Tank), because it does not emit any single HAP at 10 tons per year nor Combined HAPs at 25 tons per year (see HAP calculations on Page 2 of this TSD).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

(a) This modification will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

(b) See HAP calculations on Page 2 of this TSD.

Conclusion

The construction of this Electrodeposition Coat System (E-Coat Dip Tank) will be subject to the conditions of the attached proposed **Construction Permit No. CP-073-10313-00234.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for New Construction and Operation

Source Name:	Chief Industries, Inc.
Source Location:	1225 East Maple Street, Rensselaer, Indiana 47978
County:	Jasper
Construction Permit No.:	CP-073-10313-00234
SIC Code:	3448
Permit Reviewer:	Aida De Guzman

On December 15, 1998 the Office of Air Management (OAM) had a notice published in the Rensselaer Republican, Rensselaer, Indiana, stating that Chief Industries, Inc. had applied for a construction permit to construct and operate one (1) Electrodeposition (E-Coat Dip Tank). The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, IDEM, OAM, made the following changes to the proposed permit:

(a) The Compliance Monitoring Report Form referenced in Condition C.13(a) was not included in the proposed permit. Therefore, this form below in this Addendum is added in the final permit and numbered Page 16 of 16, and be required semi-annually. All conditions in the permit were renumbered to accommodate this Form.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

NEW CONSTRUCTION AND OPERATION

SEMI-ANNUAL COMPLIANCE MONITORING REPORT

Source Name:	Chief Industries, Inc.
Source Address:	1225 East Maple Street, Rensselaer, Indiana 47978
Mailing Address:	1225 East Maple Street, Rensselaer, Indiana 47978
CP No.:	CP073-10313-00234

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked “No deviations occurred this reporting period”.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD		
9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.		
Compliance Monitoring Requirement (Permit Condition D.1.1)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

(b) Condition C.2 Opacity Limitation in the proposed permit has been revised as follows:

C.2 **Opacity** Limitations [326 IAC 5-1-2]

Pursuant to 326 IAC 5-1-2 (~~Visible Emission~~ Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the ~~visible emissions~~ **opacity from the source** shall meet the following, unless otherwise stated in this permit:

(a) ~~Visible emissions~~ Opacity shall not exceed an average **of forty percent** (40%) opacity in **twenty-four** (24) consecutive readings, **as determined in 326 IAC 5-1-4.**

(b) ~~Visible emissions~~ Opacity shall not exceed **sixty percent** (60%) opacity for more than a cumulative total of **fifteen** (15) minutes **(sixty** (60) readings) **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor)** in a six (6) hour period.

(c) Chief Industries, Inc. had corrected the discrepancy in the data submitted in Forms W-1 and E. W-1 Form contains the correct data, and Form E for the maximum process weight rate was corrected from 60,000 lb/hr to 26,250 lb/hr. Section A.2 on Page 4 of 16, and the project description table on Page 14 of 16 of the proposed permit were corrected to reflect the correct process weight rate.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: **Chief Industries, Inc.**
Address City IN Zip: **1225 E. Maple St., Rensselaer, IN 47978**
CP: **073-10313**
Plt ID: **073-00234**
Reviewer: **Aida De Guzman**
Date: **December 1, 19**

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
E-Coat Dip Tank																
Vectrocoat 300	10.6	22.70%	0.5%	22.2%	0.6%	69.60%	0.27500	10.000	2.38	2.36	**6.50**	**155.97**	**28.46**	0.00	3.40	100%
Diisopropanolamine LGF 85	8.5	100.00%	15.0%	85.0%	15.3%	0.00%	0.00100	10.000	8.53	7.23	0.07	1.73	0.32	0.00	ERR	100%
State Potential Emissions			**Add worst case coating to all solvents**								**6.50**	**157.97**	**28.46**			

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used